

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FUND LIQUIDATION HOLDINGS LLC, as assignee and  
successor-in-interest to FrontPoint Asian Event Driven Fund  
L.P., on behalf of itself and all others similarly situated,

Plaintiff,

Docket No. 16-cv-05263-AKH

-against-

CITIBANK, N.A., BANK OF AMERICA, N.A., JPMORGAN  
CHASE BANK, N.A., THE ROYAL BANK OF SCOTLAND  
PLC, UBS AG, BNP PARIBAS, S.A., OVERSEA-CHINESE  
BANKING CORPORATION LTD., DEUTSCHE BANK AG,  
CREDIT AGRICOLE CORPORATE AND INVESTMENT  
BANK, CREDIT SUISSE AG, STANDARD CHARTERED  
BANK, DBS BANK LTD., UNITED OVERSEAS BANK  
LIMITED, AUSTRALIA AND NEW ZEALAND BANKING  
GROUP, LTD., THE BANK OF TOKYO-MITSUBISHI UFJ,  
LTD., THE HONGKONG AND SHANGHAI BANKING  
CORPORATION LIMITED, AND JOHN DOES NOS. 1-50

Defendants.

**NOTICE OF PLAINTIFF'S MOTION FOR LEAVE TO AMEND AND FILE THE  
PROPOSED FOURTH AMENDED CLASS ACTION COMPLAINT**

**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law and the record herein, Plaintiff, by and through its undersigned counsel, respectfully moves this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York on a date and time to be set by the Court, pursuant to Local Civil Rule 6.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an order granting Plaintiff's Motion for Leave to Amend and File The Proposed Fourth Amended Class Action Complaint.

Dated: December 26, 2018  
White Plains, New York

Respectfully submitted,  
LOWEY DANNENBERG, P.C.

/s/ Vincent Briganti  
Vincent Briganti  
Geoffrey M. Horn  
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*Counsel for Plaintiff*